

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

NAJIR WILLIAMS
a/k/a "Cartel,"

Defendant.

INFORMATION

07 Cr.

07CRIM1231

COUNT ONE

The United States Attorney charges:

1. From in or about 2006, up to and including in or about October 2007, in the Southern District of New York and elsewhere, NAJIR WILLIAMS, a/k/a "Cartel," the defendant, and others known and unknown, unlawfully, intentionally, and knowingly did combine, conspire, confederate and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that NAJIR WILLIAMS, a/k/a "Cartel," the defendant, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, to wit, 50 grams and more of mixtures and substances containing a detectable amount of cocaine base, in a form commonly known as "crack," in violation of Title 21, United States Code, Sections 812, 841(a)(1) and 841(b)(1)(A).

3. It was further a part and an object of the conspiracy that NAJIR WILLIAMS, a/k/a "Cartel," the defendant,

and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, to wit, mixtures and substances containing a detectable amount of marijuana, in violation of Title 21, United States Code, Sections 812, 841(a)(1) and 841(b)(1)(D).

(Title 21, United States Code, Section 846.)

COUNT TWO

The United States Attorney further charges:

4. From in or about mid-2007, up to and including in or about October 2007, in the Southern District of New York, NAJIR WILLIAMS, a/k/a "Cartel," the defendant, unlawfully, willfully, and knowingly, during and in relation to a drug trafficking crime for which they may be prosecuted in a court of the United States, namely, the offense charged in Count One of this Information, did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, and did aid and abet the use, carrying, and possession of a firearm, to wit, WILLIAMS had access to and possessed various handguns and other firearms during the course of and in furtherance of the conspiracy charged in Count One of this Information.

(Title 18, United States Code, Sections
924(c)(1)(A)(i) and 2.)

FORFEITURE ALLEGATION

5. As a result of committing the controlled substance offense alleged in Count One of this Information, NAJIR WILLIAMS,

a/k/a "Cartel," the defendant, shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds the said defendant obtained directly or indirectly as a result of the said violation and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violation alleged in Count One of this Information, including but not limited to a sum in United States currency representing the amount of all proceeds obtained as a result of the controlled substance offense alleged in Count One of the Indictment, for which the defendants are jointly and severally liable.

Substitute Asset Provision

6. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

(1) cannot be located upon the exercise of due diligence;

(2) has been transferred or sold to or deposited with, a third party;

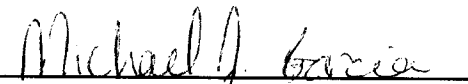
(3) has been placed beyond the jurisdiction of the court;

(4) has been substantially diminished in value; or

(5) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any property of the defendant up to the value of the above forfeitable property.

(Title 21, United States Code, Sections 846 and 853.)


MICHAEL J. GARCIA
United States Attorney